

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LAWRENCE A. SCHULER, Individually and On) Civil Action No. 1:11-cv-02484-KMW
Behalf of All Others Similarly Situated,)
)
Plaintiff,) <u>CLASS ACTION</u>
)
vs.) NOTICE OF MOTION AND
) MOTION FOR PRELIMINARY
NIVS INTELLIMEDIA TECHNOLOGY GROUP,) APPROVAL OF SETTLEMENT OF
INC., TIANFU LI, SIMON ZHANG,) CLASS ACTION
ALEXANDER CHEN, KWOK FU WONG,)
RUXIANG NIU, MINGHUI ZHANG,)
GENGQIANG YANG, CHARLES MO, RODMAN)
& RENSHAW LLC, WESTPARK CAPITAL,)
INC., and MALONEBAILEY, LLP,)
)
Defendants.)
)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Plaintiffs respectfully move, on a date convenient to the Court, before the Honorable Kimba M. Wood, for an Order granting preliminary approval of the proposed Settlement of this securities class action, pursuant to Federal Rule of Civil Procedure 23(e). This motion is based upon the accompanying memorandum of law, the Stipulation and Agreement of Settlement and the exhibits attached to it, all prior proceedings held in this action, and other such matters and arguments as the Court may consider in the hearing of this Motion.

Dated: April 28, 2014

Respectfully submitted,

LAW OFFICES OF CURTIS V. TRINKO, LLP

/s/ Curtis V. Trinko
Curtis V. Trinko (CT-1838)

Jennifer Traystman (JT-7583)
C. William Margrabe (CM-7734)
16 West 46th Street, 7th Floor
New York, NY 10036
Tel: (212) 490-9550
Fax: (212) 986-0158
Email: Ctrinko@trinko.com

Liaison Counsel for Plaintiffs

SAXENA WHITE P.A.

Maya Saxena
Joseph E. White III
Lester R. Hooker
Brandon T. Grzandziel
2424 North Federal Highway, Suite 257
Boca Raton, FL 33431
Telephone: (561) 394-3399
Facsimile: (561) 394-3382
jwhite@saxenawhite.com
lhooker@saxenawhite.com

Lead Counsel for Plaintiffs